

SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

**United States Courts
Southern District of Texas
FILED**

JUL 26 2016

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA,

v.

ABDU SHARAF GHALIB;

SIEDI SHERIF GHALIB, a/k/a
FATUMA SHERIF GHALIB;

AHMED YASSIN ABDELA; and

HALIMA YASSIN ABDELA,

Defendants.

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Criminal Action No.: H-4:16-cr-

UNDER SEAL

16 CR 0316

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

UNLAWFUL PROCUREMENT OF CITIZENSHIP OR NATURALIZATION –
18 U.S.C. § 1425(a)

On or about January 16, 2007, in the Houston Division of the Southern District of Texas,

ABDU SHARAF GHALIB,

the defendant, knowingly procured and attempted to procure, contrary to law, his naturalization, to wit: by knowingly and willfully making under oath and penalty of perjury, material false statements in connection with his application for naturalization, in violation of 18 U.S.C. § 1001, when, during an interview with an official of the United States Department of Homeland Security and on a Form N-400 Application for Naturalization, he falsely claimed that:

- (1) His only spouse was Angela Moody;
- (2) He had no children;
- (3) He was never married to more than one person at a time; and

(4) He had never given false or misleading information or documentation to any U.S. Government official while applying for any immigration benefit.

In violation of 18 U.S.C. § 1425(a).

COUNT TWO

**FALSE STATEMENTS UNDER OATH IN MATTER RELATING TO REGISTRY OF
ALIENS -- 18 U.S.C. § 1015(a)**

On or about February 24, 2014, in the Houston Division of the Southern District of Texas,

ABDU SHARAF GHALIB, and HALIMA YASSIN ABDELA,

the defendants, did knowingly make a false statement under oath, in an interview relating to a petition to remove the conditions on residence, which is a case, proceeding, and matter under section 1186a of Title 8 of the United States Code and Title 8 of the Code of Federal Regulations, a law of the United States relating to the registry of aliens, to wit: by falsely claiming that:

(1) Abdu Sharaf Ghalib had no children with his current spouse or from any other relationship;

(2) Abdu Sharaf Ghalib had only been married to Angela Moody and Halima Yassin Abdela;

(3) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib was the sister of Abdu Sharaf Ghalib; and

(4) Abdu Sharaf Ghalib and Halima Yassin Abdela had continuously lived together at the same address, and never claimed to live apart or at another address, since their marriage and arrival in the United States.

In violation of 18 U.S.C. § 1015(a).

COUNT THREE

**FALSE STATEMENTS UNDER OATH IN MATTER RELATING TO REGISTRY OF
ALIENS -- 18 U.S.C. § 1015(a)**

On or about February 27, 2014, in the Houston Division of the Southern District of Texas,

**SIEDI SHERIF GHALIB, a/k/a FATUMA SHERIF GHALIB, and
AHMED YASSIN ABDELA,**

the defendants, did knowingly make a false statement under oath, in an interview relating to a petition to remove the conditions on residence, which is a case, proceeding, and matter under section 1186a of Title 8 of the United States Code and Title 8 of the Code of Federal Regulations, a law of the United States relating to the registry of aliens, to wit: by falsely claiming that:

- (1) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib had no children with her current spouse or from any other relationship;
- (2) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib had only been married to Ahmed Yassin Abdela and no one else;
- (3) Abdu Sharaf Ghalib was the brother of Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib; and
- (4) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib, and Ahmed Yassin Abdela had continuously lived together at the same address, and never claimed to live apart or at another address, since their marriage and arrival in the United States.

In violation of 18 U.S.C. § 1015(a).

COUNT FOUR

FALSE SWEARING IN IMMIGRATION MATTER – 18 U.S.C. § 1546(a)

On or about February 24, 2014, in the Houston Division of the Southern District of Texas,

ABDU SHARAF GHALIB, and HALIMA YASSIN ABDELA,

the defendants, did knowingly make under oath a false statement with respect to a material fact in a signed statement in an interview required by the immigration laws and regulations prescribed thereunder, to wit, an interview relating to a petition to remove the conditions on residence under section 1186a of Title 8 of the United States Code and Title 8 of the Code of Federal Regulations, in that:

- (1) Abdu Sharaf Ghalib had no children with his current spouse or from any other relationship;
- (2) Abdu Sharaf Ghalib had only been married to Angela Moody and Halima Yassin Abdela;
- (3) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib was the sister of Abdu Sharaf Ghalib; and
- (4) Abdu Sharaf Ghalib and Halima Yassin Abdela had continuously lived together at the same address, and never claimed to live apart or at another address, since their marriage and arrival in the United States,

which statements the defendants then and there new were false, in that:

- (1) Abdu Sharaf Ghalib had two children with Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib;
- (2) Abdu Sharaf Ghalib had been and was currently married to Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib;
- (3) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib was the wife, and not the sister, of Abdu Sharaf Ghalib; and

(4) Abdu Sharaf Ghalib and Halima Yassin Abdela had lived apart, and Halima Yassin Abdela had claimed to live at another address, since their marriage and arrival in the United States,

In violation of 18 U.S.C. § 1546(a).

COUNT FIVE

FALSE SWEARING IN IMMIGRATION MATTER – 18 U.S.C. § 1546(a)

On or about February 27, 2014, in the Houston Division of the Southern District of Texas,

**SIEDI SHERIF GHALIB, a/k/a FATUMA SHERIF GHALIB, and
AHMED YASSIN ABDELA,**

the defendants, did knowingly make under oath a false statement with respect to a material fact in an interview required by the immigration laws and regulations prescribed thereunder, to wit, in a signed statement in an interview relating to a petition to remove the conditions on residence under section 1186a of Title 8 of the United States Code and Title 8 of the Code of Federal Regulations, in that:

- (1) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib had no children with her current spouse or from any other relationship;
- (2) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib had only been married to Ahmed Yassin Abdela and no one else;
- (3) Abdu Sharaf Ghalib was the brother of Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib; and
- (4) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib, and Ahmed Yassin Abdela had continuously lived together at the same address, and never claimed to live apart or at another address, since their marriage and arrival in the United States.

which statements the defendants then and there new was false, in that:

- (1) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib had two children with Abdu Sharaf Ghalib;
- (2) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib had been and was currently married to Abdu Sharaf Ghalib;
- (3) Abdu Sharaf Ghalib was the husband, and not the brother, of Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib; and
- (4) Siedi Sherif Ghalib, a/k/a Fatuma Sherif Ghalib and Ahmed Yassin Abdela had lived apart, and Ahmed Yassin Abdela had claimed to live at another address, since their marriage and arrival in the United States,

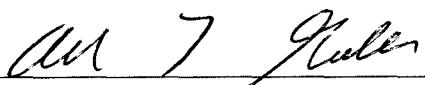
In violation of 18 U.S.C. § 1546(a).

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney, Southern District of Texas



Adam Laurence Goldman
Assistant United States Attorney